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12 CREATE NEW TECHNOLOGY (HK) CO. LTD.

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 CHINA CENTRAL TELEVISION, A
14 China company; ET AL.,

15 Plaintiffs,

16
17 vs.

18 CREATE NEW TECHNOLOGY
19 (HK) LIMITED, a Hong Kong
20 Company, ET AL.,

21 Defendants.

Case No. CV 15-1869 MMM (AJWx)

Assigned for all purposes to:
Honorable Margaret M. Morrow

NOTICE OF MOTION TO WITHDRAW
AS COUNSEL FOR DEFENDANT
CREATE NEW TECHNOLOGY (HK)
CO. LTD.

DATE: June 29, 2015
TIME: 10:00 AM
PLACE: Courtroom 780

*[Declaration of Benjamin J. Warlick In
Support of Motion to Withdraw;
[Proposed] Order filed concurrently
herewith]*

1 NOTICE IS HEREBY GIVEN that on June 29, 2015, at 10:00 AM in
2 Courtroom 780, or as soon thereafter as counsel may be heard by the above-entitled
3 Court, located at the Edward R. Roybal Federal Building and United States
4 Courthouse, 255 East Temple Street, Los Angeles, CA 90012-3332, in the
5 courtroom of the Honorable Margaret M. Morrow, defendant Create New
6 Technologies (HK) Co. Ltd. ("Create") will and hereby does move the Court to
7 allow its counsel to withdraw.

8 The reasons for this request are the following. On Friday, April 10, 2015,
9 Create directed its U.S. counsel to cease work on this matter, terminated the
10 undersigned counsel's representation of Create, and consented to this motion to
11 withdraw. The Director of Create, Zhang Wenwei, signed a written consent and
12 approval of this motion. Create has been instructed that it may not proceed pro se,
13 and has been given written notice of the consequences of its inability to appear pro
14 se. Create has confirmed that it will not file an answer or otherwise respond on
15 April 22 and will not respond to Plaintiffs' motion for preliminary injunction (Doc.
16 No. 23).

17 This motion is made following the conference of counsel pursuant to L.R. 7-3
18 which took place by email on April 9, 2015, and telephone on April 16. Plaintiffs
19 oppose this motion. On April 14, 2015, U.S. counsel sent an email regarding the
20 substance of this motion to Mr. Jeff Lee, Esq., counsel for HongHui Chen, but has
21 not yet been able to learn if HongHui Chen opposes this motion. No other party has
22 made an appearance as of the filing of this motion.

23 The motion will be based on this Notice of Motion and Motion, the
24 accompanying Memorandum of Points and Authorities, the Declaration of Benjamin
25 J. Warlick filed concurrently herewith, the pleadings and papers on file in this
26 action, and upon such other matters as may be presented to the Court at the time of
27 the hearing.
28

1 WHEREFORE, attorneys Harry A. Zinn and Lester F. Aponte with the law
2 firm Young, Zinn & Bate request that the Court enter an order allowing them to
3 withdraw as counsel for Defendant Create, relieving them of any further
4 responsibility in this matter and directing the Plaintiff to serve all future pleadings
5 and papers on Create.

6 DATED: April 17, 2015

7 By: /s/ Lester F. Aponte

8 Harry A. Zinn

9 Lester F. Aponte

10 YOUNG, ZINN & BATE LLP

11 Attorneys for Defendants

12 CREATE NEW TECHNOLOGY (HK)

13 CO. LTD.

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YOUNG, ZINN & BATE LLP
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PROOF OF SERVICE

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of 18 and not a party to the within action. My business address is 888 S. Figueroa Street, 15th Floor, Los Angeles, California 90017.

On April 17, 2015, I hereby certify that I electronically filed the foregoing document described as **NOTICE OF MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT CREATE NEW TECHNOLOGY (HK) CO. LTD.** with the Clerk of the Court for the United States District Court, Central District of California. Participants in the case who are registered users will be served by the CM/ECF system, electronically transmitted on the following interested parties in this action at the emails addressed below:

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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on April 17, 2015, at Los Angeles, California.


Patty Flores